

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

In the Matter of the Search of

USPS Priority Express Mail parcel EL751054571US
addressed to "Thomas Erwin, 6715 Dorothy's
Creek Canal Winchester, OH 43110.

Case No.

2:17-mj-494

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property

USPS Priority Express Mail parcel EL751054571US addressed to "Thomas Erwin, 6715 Dorothy's Creek Canal Winchester, OH 43110.

located in the Southern District of Ohio, Eastern Division, there is now concealed (*identify the person or describe the property to be seized*):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Title 21 USC 841(a)(1)

Offense Description

Possession with intent to distribute
a controlled substance

Title 21 USC 843(b)

Prohibited use of a communication center (U.S. Mail)

The application is based on these facts:

As set forth in the attached Affidavit of Postal Inspector MOHAMED A. SABRAH

- ☐ Continued on the attached sheet.
- ☐ Delayed notice of days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Sworn to before me and signed in my presence.

Date:

Aug. 24, 2017

City and state: COLUMBUS, OHIO

MOHAMED A. SABRAH, S. POSTAL INSPECTOR



Elizabeth A. Preston, CLERK, DISTRICT MAGISTRATE JUDGE

Printed name and title

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN THE MATTER OF THE SEARCH OF)

Case no: 2:17-mj-494

USPS Priority Express Mail parcel)

EL751054571US)

Magistrate Judge

addressed to "Thomas Erwin, 6715 Dorothys)

Creek Canal Winchester, OH 43110.")

Affidavit in Support of Application for Search Warrant

I, Mohamed A. Sabrah, Postal Inspector, being duly sworn, depose and state as follows:

1. I have been a U.S. Postal Inspector for the U.S. Postal Inspection Service since February, 2016, enforcing federal mail and drug laws; currently assigned to Columbus, OH. I worked under the guidance of Daniel J. Johnson, a U.S. Postal Inspector for the past 8 years. I have received training at U.S. Postal Inspection Service National Training Seminars for mail-related criminal investigations and have investigated cases with other federal, state, and local law enforcement units.
2. The U.S. Postal Inspection Service is aware that drug traffickers have been using Priority Express Mail, a business-oriented service offered by the U.S. Post Office, to transport controlled substances and transfer funds, cash or otherwise, to further their enterprises. As a result of past investigations and prosecutions, the Postal Inspection Service has determined that a number of indicators can be used to identify packages containing contraband that have been entered into the Priority Express Mail network. Inspectors routinely review shipment documents and Priority Mail packages originating from or destined to drug source areas, to identify instances where there is a possibility of drug trafficking.
3. On August 23, 2017 Inspectors identified a USPS Priority Express Mail parcel with tracking number EL751054571US, which was believed to contain narcotics due to information from ongoing investigations involving shipments of illegal narcotics from specific areas of the United States.
4. On August 23, 2017, Postal Inspectors took custody of USPS Priority Express Mail parcel with tracking number EL751054571US addressed to "Thomas Erwin, 6715 Dorothys Creek Canal Winchester, OH 43110", and bearing the return address of "Jonathan Jones, 219 Lime St. Inglewood, CA 90301" The parcel is a medium Flat Rate U.S. Postal Service Priority Mail white cardboard box measuring 12" x 3" x 14", weighing 4 pounds 1 ounce, and was mailed on August 22, 2017, from Newbury Park, CA with \$61.05 postage affixed.

5. According to law enforcement databases, the delivery address of 6715 Dorothys Creek Canal Winchester, OH 43110, is a legitimate address, but cannot be associated with a Thomas Erwin.
6. According to law enforcement databases, the return address of 219 Lime St. Inglewood, CA 90301, is a legitimate address, but is an apartment complex and the return address on parcel EL751054571US does not bear an apartment number/letter.
7. Your affiant knows that in the past, drug traffickers have used unknown names at legitimate addresses to receive parcels containing illegal narcotics, and have used non-existent addresses or addresses belonging to others for the sender/return address, in an attempt to legitimize the shipment in the event that the parcel is seized by law enforcement officers. Additionally, California is a known source area for shipment of illegal narcotics to Central Ohio as well as other areas of the United States.
8. On August 23, 2017, Postal Inspectors contacted Officer Mark Cartwright, Columbus Police Department, who is the handler for "Lilo," a drug detection dog most recently certified by the Ohio Peace Officers Training Council for the detection of marijuana, hashish, cocaine, "crack", heroin, and methamphetamine. K-9 "Lilo" has had 200 hours of training at Gold Shield Training Kennels, Blacklick, OH, a well-established and regarded training facility for police canines. Both in training and actual deployments, K-9 "Lilo" has successfully detected narcotics, demonstrating clear, positive, aggressive alerts, and establishing himself as a highly reliable police dog.
9. The subject parcel was hidden among other packages, and "Lilo" was allowed to search the entire area. Officer Cartwright concluded that K-9 "Lilo" did alert positively to U. S. Postal Service Mail parcel bearing label no EL751054571US. Based on that alert, Officer Cartwright concluded that the odor of one of the drugs that K-9 "Lilo" is trained and certified to detect was present.
10. Based on the information contained herein, your affiant maintains there is probable cause to believe that the USPS Priority Express Mail parcel bearing tracking number EL751054571US contains controlled substances, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b)

11. Based on the facts set forth in this affidavit, I submit that there is probable cause to believe that controlled substances are being concealed in the parcel, and seek the issuance of a warrant to search the parcel for controlled substances to be seized.



Mohamed A. Sabrah
United States Postal Inspector

Sworn to before me, and subscribed in my presence, this 24th day of August, at Columbus, Ohio.



Elizabeth A. Preston Deavers
United States Magistrate Judge